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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

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Federal Communications Commission
Office of Secretary
CC Docket No. 92-77

COMMENTS OF GATEWAY TECHNOLOGIES, INC.
ON SECOND FURTHER NOTICE OF PROPOSED RULEMAKING

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SUMMARY

The Commission's *Second Further Notice* appropriately recognizes that a "warning" disclosure is inadequate to protect parties receiving inmate-originated collect calls, since the called party cannot select an alternative carrier. In order to curb the few instances of excessive rates in the inmate services industry while maintaining the exceptional security and fraud prevention safeguards necessary in this highly specialized market, Gateway proposes that the Commission adopt the two-tiered approach of "capping" inmate service rates and requiring full rate disclosure, in real time, by inmate services providers.

Capping rates at the average current inmate service rates of the three leading IXC's (AT&T, MCI and Sprint) will provide the Commission with an efficient and effective mechanism for keeping inmate originated calls at a just and reasonable level, while providing inmate carriers with a fair opportunity to recover their unique costs associated with servicing this highly specialized market. This approach would facilitate competition in the inmate services industry by forcing inmate service providers to cut costs and increase efficiencies, while protecting rate payers from excessive rates.

Gateway also urges the Commission to require inmate carriers to disclose their rates in *real time* to the billed party before charges are incurred. Immediate, full disclosure will provide the called party with important information, currently unavailable, to make informed judgments (consistent with their personal budgets) as to whether to accept collect calls from inmates and, if so, how long to talk. Gateway's "cap and disclose" proposal is the Commission's most, indeed the only, practical solution to combat the few carriers in the industry charging excessive rates.

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**COMMENTS OF GATEWAY TECHNOLOGIES, INC.
ON SECOND FURTHER NOTICE OF PROPOSED RULEMAKING**

Gateway Technologies, Inc. ("Gateway"), by its attorneys, hereby responds to the Commission's request for comment in the captioned proceeding on alternatives to Billed Party Preference ("BPP") for "inmate only" telecommunications services.¹

The Commission's *Second Further Notice* seeks comment on "whether the public interest would be better served by some alternative remedy to BPP for prison inmate calling."² Gateway, a leading provider of inmate communications and an active participant in Commission proceedings regarding inmate services since 1990,³ proposes that the Commission adopt the two tiered approach of "capping" inmate service rates in conjunction with requiring full rate disclosure, in real time, by inmate services providers. This "cap and disclose" policy effectively balances the limited need to curb

¹ *Billed Party Preference for 0+ InterLATA Calls, Second Further Notice of Proposed Rulemaking*, CC Docket No. 92-77, FCC 96-253, ¶¶ 3, 49 (released June 6, 1996) ("NPRM" or "*Second Further Notice*").

² NPRM ¶ 49.

³ See, e.g., Comments of Gateway Technologies, Inc. on Further Notice of Proposed Rulemaking, CC Docket No. 90-313, (filed Jan. 22, 1991) ("Gateway TOCSIA Comments"); Reply Comments of Gateway Technologies, Inc. on Further Notice of Proposed Rulemaking, CC Docket No. 90-313, (Feb. 6, 1991); Comments of Gateway Technologies, Inc. on Further Notice of Proposed Rulemaking, CC Docket No. 92-77, (filed Aug. 1, 1994) ("Gateway 1994 BPP Comments"); Reply Comments of Gateway Technologies, Inc. on Further Notice of Proposed Rulemaking, CC Docket No. 92-77, (filed Sept. 14, 1994); Letter from Glenn B. Manishin, Counsel for Gateway, to William F. Caton, FCC, CC Docket No. 92-77 (Feb. 1, 1995); Comments of Gateway Technologies, Inc., Public Notice, DA 95-473, CC Docket No. 92-77, (Footnote continued on next page)

excessive rates in the inmate services industry while maintaining the exceptional security and fraud prevention safeguards that are necessary in this highly specialized market.

INTRODUCTION

The Commission's *Second Further Notice* appropriately applies separate treatment for Operator Service Providers ("OSPs") and inmate service providers. Since 1991, the FCC has recognized that inmate-only collect calling services should be exempt from the unblocking and related requirements of the Telephone Operator Consumer Services Improvements Act of 1990 ("TOCSIA").⁴ The policy rationale for treating inmate carriers separately arises from the "exceptional circumstances" that correctional institutions and the carriers face in providing service to inmates.⁵ For example, as the *Second Further Notice* recognizes, "prisons often install and maintain security equipment for a number of legitimate reasons involving security and other government prerogatives."⁶

The same "exceptional circumstances" that justify the TOCSIA exemption are the very reasons why the public benefits associated with the Commission's proposed 15% rate benchmark and disclosure requirement for OSPs would not apply in the inmate services context. The purpose behind warning OSP customers that their payphone and operator-assisted rates may be 15% above a market "benchmark" is to provide the general public with adequate information to make an informed, market-based choice of

(filed April 12, 1995) ("Gateway 1995 BPP Comments").

⁴ 47 U.S.C. § 226. See *Policies and Rules Concerning Operator Service Providers*, Report and Order, 6 FCC Rcd. 2744, 2752 (1991), citing Gateway TOCSIA Comments at 3-4. Moreover, carriers serving correctional institutions are not OSPs. "[T]he carrier providing service to inmate-only phones at correctional institutions would not fall under the definition of 'provider of operator services' as such service is not provided at an 'aggregator' location with respect to such phones." 6 FCC Rcd. at 2752 n.30.

⁵ *Id.*

carrier. For serious policy reasons, this choice simply cannot exist in the context of correctional institutions. Unlike the OSP environment, inmate service providers face significant security and fraud prevention needs that can only be satisfied through call blocking and restricting inmate services to collect calls.

As the *Second Further Notice* recognizes, because inmates in correctional facilities “are generally unable to select the carrier of their choice . . . a disclosure requirement can not directly aid such callers”⁷ in the same way as users of the OSP services. The Commission’s task is therefore to fashion an alternative to BPP that provides rate assurance and market pressures in the inmate context that are comparable to those it envisions from the 15% OSP benchmark. While Gateway continues to believe that targeted Commission enforcement efforts against inmate providers charging excessive rates are preferable, for both policy and legal reasons, to an FCC-mandated rate “cap,”⁸ in May 1995 Gateway presented the Commission with a proposal for a rate ceiling and related real-time price disclosure for inmate services.⁹ Adoption of Gateway’s “cap and disclose” proposal represents the best alternative to BPP for the inmate services market and should be adopted by the Commission.

⁶ NPRM ¶ 48.

⁷ *Id.*

⁸ See Letter from Glenn B. Manishin, Counsel for Gateway, to William F. Caton, FCC, CC Docket No. 92-77, at 1-2 (May 5, 1995) (“*Gateway 1995 Rate Cap Proposal*”) (“Gateway has consistently maintained that a rate cap is a second-best solution for inmate services. . . . [T]he Commission should regulate inmate rates through its ample investigative and enforcement powers, targeted against specific providers charging unjust and unreasonable rates.”).

⁹ *Id.*

DISCUSSION

Because the Commission cannot legitimately provide for carrier choice in the inmate services environment, it should strive for the "next best" thing. This means that unlike OSP services in general, a "warning" disclosure is inadequate to protect parties receiving inmate-originated collect calls, since the called party cannot select an alternative carrier. On the other hand, a properly structured rate cap and real-time rate disclosure requirement, specifically designed for the inmate services industry, will significantly reduce, if not eliminate, excessive inmate rates, while protecting the security interest of correctional facilities.

To reflect the unique (and higher) costs of CPE and network functionalities required to provide inmate services, the Commission should establish a rate ceiling—a rebuttable presumption of an unjust and unreasonable rate—at the *average inmate services rate of the major interexchange carriers (AT&T, MCI and Sprint)*.¹⁰ The FCC should also require "full price disclosure to the party to be billed for a collect call before connecting the call for inmate calls."¹¹ A rate ceiling, coupled with the availability of real-time price information, will create market pressures for price competition in inmate services and allow recipients of inmate calls to make informed judgments, consistent with their

¹⁰ The *Second Further Notice* cites Gateway's 1995 *Rate Cap Proposal* for the proposition that some inmate service providers can profitably provide service "at rates comparable to those charged by AT&T, MCI and other large carriers." NPRM ¶ 48 & n.125. This is correct, so long as the Commission understands that inmate service rates for the major IXC's are somewhat higher than ordinary OSP rates. As Gateway advised in 1995, "application of the prevailing current inmate service surcharge (\$3.00) and current daytime MTS rates of the dominant OSP (AT&T) are adequate to fairly compensate inmate service providers for their costs of doing business without creating a *de facto* 'maximum' rate that would encourage continued price gouging by the industry." *Gateway 1995 Rate Cap Proposal* at 2.

¹¹ NPRM ¶ 49.

personal budgets, as to whether to accept collect calls from inmates and, if so, how long to talk.

I. THE COMMISSION SHOULD ESTABLISH A CEILING FOR INMATE SERVICE RATES AT THE AVERAGE INMATE SERVICE RATE OF THE LEADING THREE IXC's

In its May 1995 rate cap proposal, Gateway urged that the Commission apply a rate ceiling "as a substitute for BPP" in order to "create positive incentives for efficiency increases and price reductions, forcing all inmate service providers to compete on the basis of both prices *and* commissions."¹² These same purposes are still applicable to the Commission's concerns in the inmate services market. Although excessive rates are a problem of limited scope in the inmate services industry, they harm the interests of both inmates/inmate families and reputable, competitive inmate service providers.¹³

An effective inmate rate ceiling should be based on the average current inmate service rates of the three leading IXCs (AT&T, MCI and Sprint).¹⁴ By using an average benchmark, the Commission will allow inmate service providers a fair opportunity to recover their costs without creating an inflated "price umbrella" which would permit excessive rates. All three of these carriers have tariffed inmate service rates specifically designed to recover the unique costs associated with servicing this highly specialized

¹² *Gateway 1995 Rate Cap Proposal* at 2.

¹³ *Id.* at 1.

¹⁴ In its *1995 Rate Cap Proposal*, Gateway originally suggested capping inmate rates at the then dominant (AT&T) inmate rate, *see* note 10 above, in contrast to the proposal by the American Public Communications Council ("APCC") for an inmate services rate cap that would allow carriers to exceed AT&T's rates by up to a full \$2.00 for an 11-minute inmate collect call. Subsequent to this filing, the Commission reclassified AT&T as a nondominant provider. In light of this change, and in view of the NPRM's reliance on a similar average for OSP rate disclosures, Gateway has modified its proposal to

market. The inmate rates are based on each carrier's MTS rate plus approximately a \$3.00 surcharge applicable to inmate-originating collect calls.

The prevailing \$3.00 inmate surcharge and average daytime "large IXC" MTS rates are an appropriate rate surrogate for a reasonable inmate per-minute rate. The \$3.00 inmate surcharge offsets some of the unique costs facing inmate service providers that do not exist in the provision of certain OSP services, such as calling card and general collect calling.¹⁵ For example, inmate service providers must install highly sophisticated and costly inmate-only CPE to meet the security and toll fraud needs of correctional institutions.¹⁶

Any reasonable rate ceiling for inmate services must recognize these unique costs, as well as the cost differences between most smaller inmate service providers, like Gateway, and the major OSPs. These differences include the disparate traffic patterns and resulting higher labor/overhead costs associated with providing collect-only telephone service to correctional facilities. For example, inmate service providers' peak traffic hours are in the evenings and weekends when inmate families are not working. The larger OSPs' traffic is heaviest during business hours, justifying more substantial night/weekend discounts in order to encourage migration of calling to off-peak time

¹⁵ In contrast, AT&T, MCI and Sprint have tariffed operator-assisted surcharges of \$2.25 and a calling card surcharge of \$1.00

¹⁶ Some of the security and administrative features provided through the CPE include: PIN assignment, calling list authorization, service blocking (900, 911, etc.), specific line number blocking (judges, witnesses, jurors, etc.), and remote polling/updating and reporting. See *Gateway 1995 Rate Cap Proposal* at 3.

periods.¹⁷ Due to their inverted traffic patterns, inmate service providers face higher labor costs (in overtime pay) in managing the night/weekend inmate traffic.

These cost differences make it economically impossible for small inmate service providers to match the night/weekend discount structures that the major OSPs have adopted for their more broadly applicable per-minute MTS rates. Furthermore, "full-service" IXC's like AT&T, MCI and Sprint, are able to spread their per-minute rates over an entire range of MTS-like services, including operator services generally, not just inmate services. Since most of the smaller inmate service providers are resellers of exclusively inmate services, they do not enjoy the same economies of scale that allow the OSPs to drive down their incremental per-minute transport costs.¹⁸ The higher costs faced by inmate service providers warrant the use of the leading OSP average *daytime* MTS rates as the benchmark for rates in this industry.

Gateway's proposal balances the need for inmate carriers to recover their specialized costs while encouraging competitive forces to work on the inmate services carriers. Currently, carriers of collect-only inmate services compete primarily on the commissions they provide to the correctional facilities.¹⁹ The problem arises when unscrupulous carriers increase inmate rates to finance higher commissions. Gateway's inmate rate cap would allow the Commission to create market-based incentives for downward pressure on rates, while still permitting inmate carriers to continue to

¹⁷ In fact, the inmate service traffic structure would actually justify an inverted rate structure, with higher prices for night/weekend calls than for daytime calls, but most inmate service providers, like Gateway, offer some discounts on night/weekend calls.

¹⁸ See *Gateway 1995 Rate Cap Proposal* at 3-4.

¹⁹ As noted below, the vast majority of the revenues derived from these commissions are used to fund inmate welfare programs, and substitute for tax revenues that would otherwise need to be raised from the general body of taxpayers.

compete in offering correctional institution commissions. Because carriers will no longer be able to use ratepayers as a resource for high commissions, inmate carriers will have to offer competitive prices and service quality in addition to commissions. Indeed, carriers will still be able to increase their commission payments to correctional institutions, but will need to do so by cutting costs and becoming more efficient, rather than by raising inmate service rates. By continuing to permit commissions (typically applied to prisoner welfare programs and in lieu of tax increases), forcing inmate collect-only carriers to cut costs and increase efficiencies, and all the while protecting rate payers from unjust and unreasonable rates, Gateway's proposal furthers the public interest.

Gateway's approach to capping inmate services rates has been endorsed in this proceeding by the Citizens United for Rehabilitation of Errants ("C.U.R.E."), one of the principal inmate-oriented advocacy groups, as an acceptable alternative to BPP. "C.U.R.E. has concluded that a properly fashioned rate cap applicable to inmate calling services might offer an effective and timely solution to the significant problem of excessive charges in the inmate calling market."²⁰

C.U.R.E. agrees with Gateway that no inmate services rate cap should permit inmate carriers to increase their charges above dominant carrier rates, or protect inmate carriers from the rigors of true rate competition. . . . C.U.R.E. commends Gateway for its efforts to fashion a rate structure that apparently will be substantially lower than the benchmark proposed by APCC.

C.U.R.E. Reply Comments at 3-4.

²⁰ Reply Comments of CURE, CC Docket No. 92-77, at 2 (filed April 27, 1995) ("C.U.R.E. Reply Comments").

Gateway is keenly aware of concerns that the Commission may lack the legal authority to create an industry-wide rate cap without detailed cost-review of inmate service or a general ratesetting rulemaking.²¹ Under its Section 201(b) and 202(a) powers to establish just and reasonable rates, we believe that the FCC is entitled to look to a market-based surrogate so long as its determinations are sensitive to the individual needs of other providers. By applying daytime MTS rates of the largest IXC's for *all* inmate services, Gateway's proposal allows ample flexibility for smaller providers, permitting the Commission to craft a fair, generic rate ceiling without time-consuming and difficult cost-of-service deliberations. Furthermore, pursuant to its statutory obligation to ensure that carriers charge just and reasonable rates, the Commission plainly has the legal authority to implement a rate "ceiling" based on the underlying just and reasonable rates of the three largest OSPs' tariffed inmate rates,²² so long as the ceiling is implemented as a rebuttable presumption. In this manner, rates above this ceiling would be considered *prima facie* unjust and unreasonable, but affected inmate services providers would still have an opportunity to prove to the Commission that higher rates are cost-justified.²³

²¹ See, e.g., Gateway 1994 BPP Comments at 22-23.

²² *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591 (1944).

²³ Gateway's 1995 *Rate Cap Proposal* urged that the Commission apply a fixed rate cap because "cost of service proceedings are notoriously poor vehicles for making fair rate decisions . . . and would place a significant resource burden on inmate families and their representatives. *Gateway 1995 Rate Cap Proposal* at 6. The modified approach indicated in the text has been developed in response to questions raised about the Commission's statutory power to impose a generic, industry-wide rate cap.

II. THE COMMISSION SHOULD REQUIRE FULL DISCLOSURE OF INMATE SERVICE RATES IN REAL TIME

The Commission should require providers of inmate collect-only services to fully disclose their identity and their rates in *real time* to the billed party before the call is completed and charges are incurred.²⁴ Immediate, full disclosure will not only inform the billed party of the nature of the applicable charges before accepting the call, but also provide the called party with important information, currently unavailable, to make informed judgments (consistent with their personal budgets) as to whether to accept collect calls from inmates and, if so, how long to talk.²⁵

The disclosure proposed in the *Second Further Notice* for OSP services in general does little to empower parties receiving inmate-originated collect calls, because these users have no choice of carrier. They cannot hang up the phone, call the carrier to make a rate inquiry, and redial the call using an access code. Therefore, the only information useful to recipients of inmate calls is rate information provided in real time, prior to acceptance of the call. Thus, Gateway fully concurs with the Commission's suggestion that it should also require "full price disclosure to the party to be billed for a collect call before connecting the call for inmate calls."²⁶

Real-time rate disclosure would have a significant, and beneficial, impact on the inmate services market. For instance, aware of the charges, the billed party may make an informed decision about whether to accept or refuse the call on the basis of whether

²⁴ Gateway 1995 BPP Comments.

²⁵ For this reason, Gateway has voluntarily provided real time rate disclosures for the past two years. In the inmate services context, real-time rate quotes are thus technically feasible, especially given the powerfully sophisticated functionalities built into correctional institution CPE.

²⁶ NPRM ¶ 49.

they are unaffordable. Furthermore, if the billed party accepts the call, he/she will anticipate the charges, avoiding any "rate shock" at the end of the month when the bill arrives. Finally, and perhaps most significantly, the called party will now be able to *tailor the length of his/her telephone conversation* with an inmate depending on the rates and the ability to pay those rates. Since calls from inmates present significant emotional issues for users, and because most users who are unable to pay their inmate service bills are responsible consumers who simply had no idea that the charges for inmate collect calls were higher than ordinary calls or that they had accepted so many collect calls from a loved one in prison or jail,²⁷ the single most useful piece of information for a called party is the rate at which the call will be billed. Thus, under Gateway's proposal, inmate carriers and correctional facilities will continue to be protected by call blocking, while the inmate families and other ratepayers will enjoy as much control and choice as possible, and substantially more than today.

In addition, the Commission should require inmate providers to disclose the fact that they are subject to a rate cap and that inmate toll rates exceeding this cap are *prima facie* unjust and unreasonable. Gateway believes that a significant percentage of the complaints before the FCC about excessive rates stem from a misunderstanding as to which carrier is providing their collect-inmate service; the unique costs associated with providing this service; and the necessary inmate surcharge widely recognized as necessary to offset these costs. By providing the billed party with full information regarding the carrier's rates in real time, the Commission will mitigate any "rate shock"

²⁷ Gateway has instituted a program under which it works with inmate families to establish payment plans and periodic budgets (weekly and monthly) to assist billed parties in avoiding becoming
(Footnote continued on next page)

and supply inmate families with control, rather than abandoning them to "talk in the dark."

Gateway's "cap and disclose" proposal is the most, indeed the only, practical solution to combat the few carriers in the industry charging excessive rates. Since the inception of the BPP proceeding, no party, either industry or public interest, has introduced any viable technical solution to the Commission's concern over excessive rates. There is no possible technical solution that recognizes the special security and fraud prevention needs of inmate telecommunications services while allowing a choice of carriers. Even if it were appropriate as a policy matter, BPP simply cannot be implemented for the inmate market because it would have to be a network-based solution, not a CPE solution.

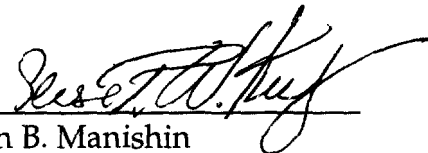
CONCLUSION

Gateway's "cap" and "disclose" policy represents the most practical and effective mechanism for the Commission to impose downward pressure on collect only inmate service rates while preserving the critical security and toll fraud prevention safeguards necessary to serve this specialized market. In addition, by requiring inmate service

financially overextended on inmate calls.

carriers to disclose their rates in real time, the Commission will provide inmate families with the control and autonomy over their monthly inmate telephone bills. Gateway's "cap" and "disclose" proposal is in the public interest and should be adopted by the Commission.

Respectfully submitted,

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